

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CONSENT MOTION FOR DISCOVERY PROTECTIVE ORDER

The parties jointly move for the entry of the protective order appended as Exhibit 1 hereto. In support of the motion, the parties state that discovery in this action entails disclosure of documents and other material (such as video interviews) that involve sensitive personnel disciplinary matters and law enforcement planning information that warrants protection from general distribution. The parties agree that it is appropriate to produce material in discovery that is designated as "attorneys/experts eyes only," subject to further review as needed. Accordingly, the parties have agreed to the appended protective order and respectfully request that the Court enter it.

Respectfully submitted,

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